

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: CRIMINAL NO. _____
	:
v.	: DATE FILED _____
	:
YETUNDE LATIFAT WELLS	: VIOLATIONS:
	: 21 U.S.C. § 963
	: (conspiracy to import more than
	: 1 kilogram of heroin – 1 count)
	: 21 U.S.C. § 952
	: (importation of more than 1
	: kilogram of heroin - 1 count)
	: 18 U.S.C. § 2
	: (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Between on or about November 21, 2003, and on or about February 29, 2004, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

YETUNDE LATIFAT WELLS

conspired and agreed, with Adedoyin Adebisi, Oluremi Balogun, Oyekunle Oyeyipo, charged elsewhere, and with other persons unknown to the grand jury, to knowingly and intentionally import more than one kilogram, that is, at least 7 kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, into the United States from a place outside thereof, that is, Nigeria, in violation of Title 21, United States Code, Sections 952(a) and 960(b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

1. Defendant YETUNDE LATIFAT WELLS and others offered to pay and paid individuals to travel by airline from Nigeria to the United States with multi-kilogram quantities of heroin concealed in their suitcases.
2. Defendant YETUNDE LATIFAT WELLS and others offered to pay Oyekunle Oyeyipo to travel twice from Nigeria to the United States in order to import heroin on their behalf.
3. Defendant YETUNDE LATIFAT WELLS and an unknown person met with Oyekunle Oyeyipo when he returned to the United States from Nigeria, accepted the heroin that he had brought with him, and paid him in United States currency.
4. Defendant YETUNDE LATIFAT WELLS assisted Oyekunle Oyeyipo in procuring airline tickets so that he could return to Nigeria in order to smuggle additional heroin into the United States.
5. Defendant YETUNDE LATIFAT WELLS and unknown persons met with Oyekunle Oyeyipo in Nigeria and provided him with a suitcase containing heroin for Oyekunle Oyeyipo to bring back to the United States in exchange for payment.
6. Persons unknown offered to pay Adedoyin Adebisi to travel from Nigeria to Philadelphia, in the Eastern District of Pennsylvania, in order to import heroin on their behalf.
7. Defendant YETUNDE LATIFAT WELLS offered to pay Oluremi Balogun to travel from Chicago, Illinois, to Philadelphia, in the Eastern District of Pennsylvania, to bring Adedoyin Adebisi and a suitcase containing heroin back to Chicago, Illinois.

8. Adedoyin Adebiyi traveled from Nigeria, through Frankfurt, Germany, then to the Philadelphia International Airport, in the Eastern District of Pennsylvania, in order to transport heroin to the United States.

9. Adedoyin Adebiyi arrived in the United States, at Philadelphia International Airport, in the Eastern District of Pennsylvania, with the heroin concealed within her suitcase for delivery to Oluremi Balogun on behalf of YETUNDE LATIFAT WELLS.

10. Oluremi Balogun flew from Chicago to Philadelphia in order to bring Adedoyin Adebiyi and the suitcase containing heroin to Chicago on behalf of YETUNDE LATIFAT WELLS.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the purposes thereof, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 21, 2003, Oyekunle Oyeyipo flew from Nigeria to Dulles International Airport with heroin concealed in a suitcase.

2. On or about November 21, 2003, defendant YETUNDE LATIFAT WELLS, and a person unknown to the grand jury, met with Oyekunle Oyeyipo at a hotel near Dulles International Airport and took from Oyekunle Oyeyipo a suitcase with heroin concealed within its walls.

3. On or about February 6, 2004, Adedoyin Adebiyi obtained a suitcase with approximately 2,988 grams of heroin concealed within its walls.

4. On or about February 6, 2004, Adedoyin Adebiyi flew, with the suitcase containing heroin, from Abuja, Nigeria, aboard Lufthansa Airlines, with an ultimate destination of Philadelphia International Airport and a stopover in Frankfurt, Germany.

5. On or about February 6, 2004, YETUNDE LATIFAT WELLS spoke with Oluremi Balogun and offered to pay Oluremi Balogun to travel from Chicago, Illinois, to Philadelphia, in the Eastern District of Pennsylvania, to bring Adedoyin Adebisi and a suitcase containing approximately 2,988 grams of heroin back to Chicago, Illinois.

6. On or about February 7, 2004, Oluremi Balogun flew from Chicago, Illinois, to Philadelphia International Airport, in the Eastern District of Pennsylvania, to meet Adedoyin Adebisi.

7. On or about February 7, 2004, Oluremi Balogun met Adedoyin Adebisi at Philadelphia International Airport. Both women traveled together by taxi from the Philadelphia International Airport to the Greyhound bus station in downtown Philadelphia, bringing with them the suitcase containing the heroin.

8. In or about February, 2004, defendant YETUNDE LATIFAT WELLS met with Oyekunle Oyeyipo at Baltimore-Washington International Airport in Baltimore, Maryland, and provided Oyekunle Oyeyipo with airline tickets for Oyekunle Oyeyipo to fly to Nigeria to bring back heroin.

9. On or about February 29, 2004, Oyekunle Oyeyipo departed Nigeria and flew to Detroit, in the Eastern District of Michigan, with approximately 4,695.5 grams of heroin concealed within his suitcase.

All in violation of Title 21, United States Code, Section 963.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2004, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

YETUNDE LATIFAT WELLS

knowingly and intentionally imported, and aided and abetted the importation of, more than 1 kilogram, that is, approximately 2,988 grams, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, into the United States from a place outside thereof, that is, Nigeria.

In violation of Title 21, United States Code, Sections 952(a), 960(a) and 960(b)(1)(A), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney